

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA)	
)	
v.)	CASE NO. 5:22-CR-49
)	
NATHAN CARMAN)	

UNOPPOSED MOTION TO CONTINUE

NOW COMES, the undersigned attorney Robert W. Katims, and hereby respectfully requests that this Court continue for a period of sixty (60) days the status conference now set for October 5, 2022. The Government does not oppose this motion. In support of this motion, Defendant states the following:

1. Defendant was arraigned on May 11, 2022.
2. Defendant has, until recently, been represented by the Federal Public Defender.
3. Defendant has recently retained private counsel, Martin Minnella. On September 30, 2022, the undersigned entered his appearance for Defendant. On today's date, Defendant is filing a Motion Pro Hac Vice to allow Attorney Minnella to represent Defendant. The undersigned will serve as local counsel.
4. Additional time is necessary for new counsel to review discovery and meet with Defendant prior to any status conference.
5. The Government, per AUSA Paul Van de Graaf, does not oppose this motion.
6. This case has been designated a complex case.

7. Defendant agrees that any period of delay resulting from the Court granting this motion to continue shall be excludable in computing time in which the trial in this case must commence pursuant to the Speedy Trial Act.

WHEREFORE, the undersigned respectfully requests that the Court grant his motion.

DATED at Burlington, Vermont this 3rd day of October, 2022.

By: _____
Robert W. Katims, Esq.
Hoff Curtis
60 Main Street
Burlington, VT 05401
(802) 864-6400
rkatims@hoffcurtis.com